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Attorneys for Defendant THE AMERICAN BOARD OF PEDIATRICS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
[SAN JOSE DIVISION]

CHANDANI DEZURE, an individual,)

Case No. 5:20-cv-09123

Plaintiff,)

STIPULATION TO DISMISS ACTION
WITHOUT PREJUDICE

v.)

THE AMERICAN BOARD OF)

PEDIATRICS; and DOES 1-50, inclusive,)

Defendants.)

Recitals

Whereas, the parties to this action have reached an agreement to resolve this matter, the terms of which are confidential;

Whereas, the parties wish to dismiss this action without prejudice as a result of, and subject to, the terms of the confidential agreement reached by and between the parties;

Whereas, the parties request the Court retain jurisdiction to enter a dismissal with prejudice at a later date in the event that future events occur, the occurrence of which is not presently certain.

Stipulation

Pursuant to Rule 41(a)(1)(A)(ii), IT IS HEREBY STIPULATED by all parties that have appeared in this action that this lawsuit be dismissed without prejudice as to all parties and all causes of action, with each side to bear its own fees and costs.

The Parties further stipulate that the Court retain jurisdiction to enter a dismissal with prejudice in the future if events, presently uncertain to occur, occur and the parties file such a request.

DATED: March 31, 2022

MITCHELL BARLOW & MANSFIELD, P.C.

By: /s/

CHRIS SULLIVAN
Attorneys for Defendant
THE AMERICAN BOARD OF PEDIATRICS, INC.

DATED: March 31, 2022

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/

JESSICA S. PLINER
Attorneys for Defendant
THE AMERICAN BOARD OF PEDIATRICS, INC.

1 DATED: March 31, 2022

LeCLERC & LeCLERC LLP

3 By: 

4 Christopher R. LeClerc
5 Attorneys for Plaintiff
6 CHANDANI DeZURE

7 **SIGNATURE ATTESTATION**

8 Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
9 document has been obtained from the other signatories.

10 DATED: March 31, 2022

LeCLERC & LeCLERC LLP

13 By: /s/

14 Christopher R. LeClerc
15 Attorneys for Plaintiff
16 CHANDANI DeZURE

17 PURSUANT TO STIPULATION, IT IS SO ORDERED,

18 Date: March 31, 2022

